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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 William Algeo IV Weed,
14
15 Plaintiff,

16 vs.

17 Equifax Information Services, LLC et al,
18
19 Defendants.

Case No.: **2:24-cv-01560-GMN-MDC**

**DISCOVERY PLAN AND
PROPOSED SCHEDULING ORDER**

SUBMITTED IN COMPLIANCE WITH LR 26-1(b)

20 Plaintiff WILLIAM ALGEO IV WEED and Defendant EQUIFAX
21 INFORMATION SERVICES, LLC, by and through their counsel of record, hereby
22 submit their stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule
23 of Civil Procedure 16 and 26, as well as LR 16-1 and 26-1.

24
25 It is hereby requested that the Court enter the following discovery plan and
26 scheduling order:
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1. Discovery Plan:

Discovery Cut-Off	05/01/2025 (180 days from the date Defendant filed its Answer)
Deadline to Amend Pleadings	02/01/2025 (90 days prior to the close of discovery)
Deadline to Disclose Initial Expert Disclosures	03/03/2025 (60 days prior to the close of discovery)
Deadline to Disclose Rebuttal Expert Disclosures	04/03/2025 (30 days after the Initial Disclosure of Experts)
Deadline to File Dispositive Motions	06/02/2025 (30 days after the close of discovery)

3. Pre-Trial Order: The parties shall file a joint pretrial order no later than **7/02/2025** or thirty (30) days after the date set for filing dispositive motions. In the event that parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motions or further order of the Court.

4. Extensions or Modifications of the Discovery Plan and Scheduling

Order: Applications to extend any date set by the discovery plan, scheduling order, or other order must comply with the Local Rules.

5. Initial Disclosures: The parties shall make initial disclosures on or before **February 3, 2025**. Any party seeking damages shall comply Federal Rules of Civil Procedure 26(a)(1)(A)(iii).

1 **6. Protective Order:** The parties may seek to enter a stipulated protective order
2 pursuant to Rule 26(c) prior to producing any confidential documents. Any such
3 stipulated protective order will be sought no later than **February 14, 2025**.
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5 **7. Electronic Service:** The parties agree that pursuant to Rules 5(b)(2)(E) and
6 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
7 served by sending such documents by email.
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9 **8. Alternative Dispute Resolution Certification:** The parties certify that they
10 met and conferred about the possibility of using alternative dispute-resolution
11 processes including mediation, arbitration, early neutral evaluation. The parties have
12 not reached any stipulations at this stage.
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14 **9. Alternative Forms of Case Disposition Certification:** The parties certify
15 that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c)
16 and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-
17 01). The parties have not reached any stipulations at this stage.
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20 **10. Electronically Stored Evidence.**
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22 The parties have discussed the retention and production of electronic data. The
23 parties agree that service of discovery by electronic means, including sending original
24 electronic files by email or on a CD is sufficient. The parties reserve the right to revisit
25 this issue if a dispute or need arises.
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11. Electronic Evidence Conference Certification: The parties further intend to present evidence in electronic format to jurors for the purposes of jury deliberations at trial. The parties discussed the presentation of evidence for juror deliberations but did not reach any stipulations as to the method at this early stage.

Dated January 8, 2025

<u>/s/ Ari H. Marcus</u> Ari H. Marcus, Esq. MARCUS & ZELMAN, LLC 701 Cookman Avenue, Suite 300 Asbury Park, New Jersey 07712 (845) 367-7146 ari@marcuszelman.com PRO HAC VICE Attorney for Plaintiff	<u>/s/ Gia Marina</u> Gia Marina, Esq. CLARK HILL PLC 1700 South Pavilion Center Drive Suite 500 Las Vegas, NV 89135 (702) 862-8300 gmarina@clarkhill.com Attorney for Defendant Equifax Information Services, LLC
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SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED



Hon. Maximiliano D. Conwiller III
United States Magistrate Judge

Dated: 1/10/2025